

ORIGINAL

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
8EHQ-12-18788	88120000331	8/27/12

COMMENTS:

DOES NOT CONTAIN CBI

MR# 348149

RECEIVED
OPPT CBIC

2012 AUG 27 AM 10: 07

August 24, 2012

DELIVERY BY FED EX

Document Control Office (7407M)
U.S. Environmental Protection Agency
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
1201 Constitution Avenue, NW
Washington, DC 20004



SUBJECT: Notice in Accordance with Section 8(e): Results of Short-Term Toxicity and Growth Inhibition Studies with Diamminedichloropalladium (DDP) (CAS No. 14323-43-4)

Dear Section 8(e) Coordinator:

Umicore USA, Inc. is submitting results of Short-Term Toxicity and Growth Inhibition Studies conducted as part of the European Union Classification, Labeling and Packaging of Substances and Mixtures (CLP) classification of diamminedichloropalladium (DDP) (CAS No. 14323-43-4), as reported by WCA Environment in an August 2012 update notification.

According to WCA Environment, as part of the European Registration, Evaluation, Authorization of Chemicals (REACH) registration process the following tests were commissioned at Brixham Laboratories to evaluate the environmental classification of DDP:

- Short-term toxicity testing on aquatic invertebrates – OECD 202
- Growth inhibition study on aquatic plants – OECD 201
- Short-term toxicity testing on fish – OECD 203

The results from the above test are presented below.

TEST	RESULT
Short-term <i>Daphnia</i>	48-h EC50 = 69.91 µg/L DDP
Algal growth inhibition	72-h EC50 Yield = 4.03 mg/L DDP 72-h EC50 Growth Rate = 5.88 mg/L DDP 72-h NOEC Growth Rate & Yield = 2.64 DDP
Short-term fish	96-h EC50 = 306 µg/L DDP

CONTAINS NO CBI



CONTAINS NO CBI


Umicore USA Inc.
3600 Glenwood Ave., Suite 250
Raleigh, NC 27612

Phone 1-919-874-7138 • Fax 1-919-874-7195
E-mail: theron.grim@am.umicore.com
www.umicore.com

Based on the results of the studies and in accordance with the revised guidance using the 2nd Adaptation to Technical Progress (ATP) to the CLP Regulation (Commission (EU) No 286/20112, WCA Environment has recommended that the environmental classification of DDP be revised from Aquatic Acute 4 to Aquatic Acute 1, Chronic 1.

Umicore USA, Inc. understands that reporting of the results from this study under TSCA 8(e) is in accordance with EPA's policy.

If you have any questions, please contact the undersigned at (919) 874-7138.

A handwritten signature in black ink, appearing to read 'Theron Grim', followed by a horizontal line extending to the right.

Theron Grim
Environmental Engineering Manager, North America
Umicore USA, Inc.

MR# 348150

RECEIVED
OPPT CBIC

August 24, 2012

2012 AUG 27 AM 10: 07

DELIVERY BY FED EX

Document Control Office (7407M)
U.S. Environmental Protection Agency
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
1201 Constitution Avenue, NW
Washington, DC 20004

SUBJECT: Notice in Accordance with Section 8(e): Results of Acute Eye Irritation Study in Rabbits with Diamminedichloropalladium (DDP) (CAS No. 14323-43-4)

Dear Section 8(e) Coordinator:

Umicore USA, Inc. is submitting results of an Acute Eye Irritation Study, conducted on behalf of The Precious Metal and Rhenium Consortium for the European Union Classification, Labeling and Packaging of Substances and Mixtures (CLP) classification of diamminedichloropalladium (DDP) (CAS No. 14323-43-4). The study was performed in New Zealand White rabbits by CiToxLAB Hungary Ltd. The irritation effects of the test item were evaluated according to the Draize Method (OECD 405, 2002).

According to the results of the CiToxLAB Hungary Ltd. study, the test item DDP, when applied to the rabbit eye, caused significant conjunctival and corneal irritant effects at 1 hour which further increased at the 24, 48, and 72 hour observation time points. The conjunctival and corneal irritation after 1 week was similar to the 72 hour observations. The effects were reduced at 2 weeks but were not fully reversible within 3 weeks.

The individual mean scores were as follows.

TEST PARAMETER	RESULT (24hr, 48hr, 72hr)
Chemosis	3.00, 3.33, 3.00
Discharge	3.00, 3.00, 3.00
Redness	2.00, 2.00, 2.00
Cornea Opacity	1.00, 1.67, 1.67
Iris	0.00, 0.00, 0.00

CONTAINS NO CBI

Umicore USA Inc.
3600 Glenwood Ave., Suite 250
Raleigh, NC 27612

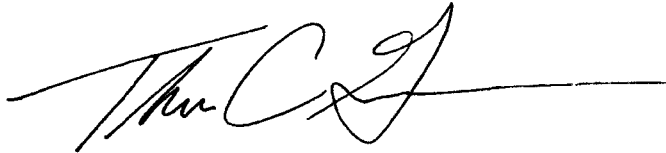
Phone 1-919-874-7138 • Fax 1-919-874-7195
E-mail: theron.grim@am.umicore.com
www.umicore.com

U.S. Environmental Protection Agency
August 24, 2012
Page 2 of 2

Based on the results of the studies and in accordance with Regulation (EC) No 1272/2008, CiToxLAB Hungary Ltd. recommends DDP be classified as Category 1 (irreversible effects on eye).

Umicore USA, Inc. understands that reporting of the results from this study under TSCA 8(e) is in accordance with EPA's policy.

If you have any questions, please contact the undersigned at (919) 874-7138.

A handwritten signature in black ink, appearing to read 'Theron Grim', followed by a long horizontal line extending to the right.

Theron Grim
Environmental Engineering Manager, North America
Umicore USA, Inc.

From: (919) 271-6105
Theron Grim

Origin ID: RZZA



3600 Glenwood Avenue

Raleigh, NC 27612

Ship Date: 24AUG12
ActWgt: 1.0 LB
CAD: 104282387/NET3300

Delivery Address Bar Code



SHIP TO: (202) 564-8940

BILL SENDER

Section 8(e)

US Environmental Protection Agency

1201 CONSTITUTION AVE NW

TSCA CBI (7407M) EPA East-Room 6428

WASHINGTON, DC 20460

Ref # 61255001-502820

Invoice #

PO #

Dept #

MON - 27 AUG A1
STANDARD OVERNIGHT

TRK# 7988 1649 9370

0201

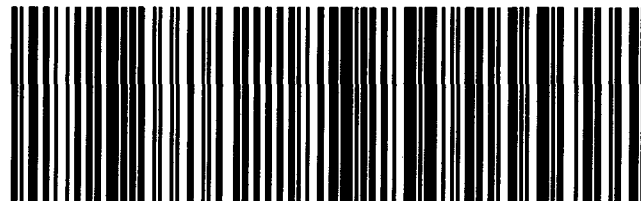
ASR

20460

DC-US

DCA

XC RDVA



515G2/DC34/AA44

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

From: (919) 271-8105
Theron Grim

Origin ID: RZZA



3600 Glenwood Avenue

Raleigh, NC 27612

Ship Date: 24AUG12
ActWgt: 1.0 LB
CAD: 104282387/INET3300

Delivery Address Bar Code



SHIP TO: (202) 564-8940

BILL SENDER

Section 8(e)

US Environmental Protection Agency

1201 CONSTITUTION AVE NW

TSCA CBI (7407M) EPA East-Room 6428

WASHINGTON, DC 20460

Ref # 61255001-502820

Invoice #

PO #

Dept #

MON - 27 AUG A1
STANDARD OVERNIGHT

TRK# 7988 1650 2863

0201

ASR

20460

DC-US

DCA

XC RDVA



515G2JC34/AA44

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.